

U.S. FOREIGN
INTELLIGENCE
SURVEILLANCE COURT

UNITED STATES

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FOREIGN INTELLIGENCE SURVEILLANCE COURT

LEEANN FLYNN HALL
CLERK OF COURT

WASHINGTON, D.C.

IN RE MOTION FOR DECLARATORY JUDGMENT OF A FIRST AMENDMENT RIGHT TO PUBLISH AGGREGATE INFORMATION ABOUT FISA ORDERS)	Docket No. Misc. 13-03
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IN RE MOTION TO DISCLOSE AGGREGATE DATA REGARDING FISA ORDERS)	Docket No. Misc. 13-04
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IN RE MOTION FOR DECLARATORY JUDGMENT TO DISCLOSE AGGREGATE DATA REGARDING FISA ORDERS AND DIRECTIVES)	Docket No. Misc. 13-05
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IN RE MOTION FOR DECLARATORY JUDGMENT TO DISCLOSE AGGREGATE DATA REGARDING FISA ORDERS AND DIRECTIVES)	Docket No. Misc. 13-06
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IN RE MOTION FOR DECLARATORY JUDGMENT TO REPORT AGGREGATED DATA REGARDING FISA ORDERS)	Docket No. Misc. 13-07
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JOINT MOTION FOR PARTIAL STAY OF PROCEEDINGS

In accordance with the Court's Order of October 11, 2013, the parties have met and conferred regarding the Movants' request for access to unredacted versions of the Government's response and declaration. The parties have been unable to reach agreement on this issue, and after informing the Government that they intended to seek relief from the Court in regard to the

Government's redacted submissions, on November 12, 2013, Movants filed their Motion to Strike the Government's *Ex Parte* Response to Motions to Disclose Aggregate Data Regarding FISA Orders.

Accordingly, the parties hereby jointly move for a stay of the deadline for the Movants' reply to the Government's response to the Movants' motions for declaratory relief. The parties request that the Court stay the deadline for the Movants' reply until the Court resolves the Movants' pending motion for relief in regard to the Government's redacted submissions. At that point in time, the deadline for the Movants' reply can be re-set as appropriate under the circumstances. The parties propose that the Government's opposition to Movants' motion for relief in regard to the Government's redacted submissions be filed on or before December 6, 2013, and that the Movants' reply with respect to that motion be filed on or before December 20, 2013. A proposed Order is attached.

November 13, 2013

Respectfully submitted,

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UNITED STATES
FOREIGN INTELLIGENCE SURVEILLANCE COURT
WASHINGTON, D.C.

IN RE MOTION FOR DECLARATORY)	
JUDGMENT OF A FIRST AMENDMENT)	Docket No. Misc. 13-03
RIGHT TO PUBLISH AGGREGATE)	
INFORMATION ABOUT FISA ORDERS)	
)	
IN RE MOTION TO DISCLOSE AGGREGATE)	
DATA REGARDING FISA ORDERS)	Docket No. Misc. 13-04
)	
IN RE MOTION FOR DECLARATORY)	
JUDGMENT TO DISCLOSE AGGREGATE)	Docket No. Misc. 13-05
DATA REGARDING FISA ORDERS)	
AND DIRECTIVES)	
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IN RE MOTION FOR DECLARATORY)	
JUDGMENT TO DISCLOSE AGGREGATE)	Docket No. Misc. 13-06
DATA REGARDING FISA ORDERS)	
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IN RE MOTION FOR DECLARATORY)	
JUDGMENT TO REPORT AGGREGATED)	Docket No. Misc. 13-07
DATA REGARDING FISA ORDERS)	
)	

**[PROPOSED] ORDER GRANTING JOINT MOTION
FOR PARTIAL STAY OF PROCEEDINGS**

On November 13, 2013, the parties in the above-captioned cases filed a joint motion for a partial stay of proceedings. Accordingly, it is hereby ORDERED that the joint motion is GRANTED and (1) the deadline for the Movants' reply is stayed pending the Court's resolution

of the Movants' motion for relief in regard to the Government's redacted submissions, (2) the Government's opposition to Movants' motion for relief in regard to the Government's redacted submissions shall be filed on or before December 6, 2013, and (3) the Movants' reply with respect to that motion shall be filed on or before December 20, 2013.

SO ORDERED, this ____ day of November, 2013.

REGGIE B. WALTON
Judge, United States Foreign
Intelligence Surveillance Court